



# Notice of Intent to Apply for Coverage Under MS4 General Permit

Form 3400-191 (R 3/06)

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**Notice:** This application is authorized by s. 283.37, Wis. Stats., and chs. NR 151 and 216, Wis. Adm. Code. Personally identifiable information on this form may be used for other program purposes and may be made available to requestors under Wisconsin's Public Records laws and be posted on the Department's internet site.

**Instructions:** Complete the following for all permit applications. If additional space is needed to respond to a question, attach additional pages. Provide descriptions below that explain the program activities that you expect to develop and implement to comply with the Municipal Separate Storm Sewer System (MS4) general permit (<http://dnr.wi.gov/org/water/wm/nps/stormwater/muni.htm>). Section 3 of the MS4 general permit contains the compliance schedules that direct when the individual program activities need to be developed and submitted to the Department for review. The detailed programs that are developed and submitted to the Department for review may deviate from the program activities described below if necessary. The descriptions provided below are necessary for the Department to verify that the municipality's program activities comply with the permit.

## Section I: Applicant Information

Name of Municipality

WINNEBAGO COUNTY

Mailing Address

625 E. COUNTY RD. Y, SUITE 100

City

OSHKOSH

State

WI

Postal Code

54901

County(s) in which Applicant is located

Type of Municipality: (check one)

☒ County ☐ City ☐ Village ☐ Town ☐ Other (specify)

## Section II: Local Contact Information (check one)

Name of Municipal Contact Person

KEITH MARQUARDT, WINNEBAGO CO. LAND+WATER CONSERVATION

Title

PROJECT TECHNICIAN

Mailing Address

625 E. COUNTY RD. Y, SUITE 100

City

OSHKOSH

State

WI

Postal Code

54901

E-mail address

KMARQUARDT@CO.WINNEBAGO.WI.US

Telephone Number (include area code)

920/232-1957

Fax Number (include area code)

920/424-1277

## Section III: Water Quality Concerns

Yes No

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Does any part of the MS4 discharge to an outstanding resource water (ORW) or exceptional resource water (ERW) listed under s. NR 102.10 or 102.11, Wis. Adm. Code? (An unofficial list of ORWs and ERWs may be found on the Department's Internet site at: <http://dnr.wi.gov/org/water/wm/wqs/>)

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Does any part of the MS4 discharge to an impaired waterbody listed in accordance with section 303(d)(1) of the federal Clean Water Act, 33 USC § 1313(d)(1)(C)? (A list of Wisconsin impaired waterbodies may be found on the Department's Internet site at: <http://dnr.wi.gov/org/water/wm/wqs/303d/303d.html>) 1 ditch

## Section IV: Area and Population Within the MS4

Yes No

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Is the MS4 within an "Urbanized Area" as defined by U.S. EPA? (See <http://www.epa.gov/npdes/pubs/fact2-2.pdf>)

If no, skip the rest of this section and continue to Section V. If yes, estimate the area served by and the population within the MS4 in an Urbanized Area (UA).

(Urbanized Area maps are available on the EPA web site at: <http://cfpub1.epa.gov/npdes/stormwater/urbanmaps.cfm>)

Total municipal area (in square miles):

439 (BASED ON U.S. CENSUS BUREAU)

Total municipal population (in year 2000):

156,763 (BASED ON U.S. CENSUS BUREAU)

MS4 service area within Urbanized Area (in square miles):

TO BE DETERMINED

Municipal population within Urbanized Area (in year 2000):

SANS OTHER MS4 COMMUNITIES, TO BE DETERMINED

## Section V: Potential Permit Exemption

Yes No

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Section NR 216.023, Wis. Adm. Code, allows certain MS4s that have less than 1000 people residing in an urbanized area to be waived from having to obtain municipal storm water permit coverage.

Do you believe that the MS4 may be eligible for this potential exemption?

**Section VI: Summary of Municipal Storm Water Program Activities**

Describe the programs or activities the municipality is doing or will do to comply with the requirements of the MS4 general permit. Attach additional pages if necessary.

**A. Public Education and Outreach**

Describe the public education and outreach program activities that the municipality will implement to comply with section 2.1 of the MS4 general permit.

PLEASE SEE ATTACHED.

**B. Public Involvement and Participation**

Describe the public involvement and participation program activities that the municipality will promote to comply with section 2.2 of the MS4 general permit.

PLEASE SEE ATTACHED.

**C. Illicit Discharge Detection & Elimination**

Describe the illicit discharge detection and elimination program authority and activities that the municipality will develop and implement to comply with section 2.3 of the MS4 general permit.

PLEASE SEE ATTACHED.

**D. Construction Site Pollution Control**

Describe the construction site pollutant control program authority and activities that the municipality will develop and implement to comply with section 2.4 of the MS4 general permit.

PLEASE SEE ATTACHED.

**E. Post-Construction Site Storm Water Management**

Describe the post-construction storm water management program authority and activities that the municipality will develop and implement to comply with section 2.5 of the MS4 general permit.

PLEASE SEE ATTACHED.

**F. Pollution Prevention**

Describe the pollution prevention program activities that the municipality will implement to comply with section 2.6 of the MS4 general permit.

PLEASE SEE ATTACHED.

**Section VII: Certification**

I hereby certify that I am an authorized representative of the municipality that is the subject of this application for general permit coverage, and that the information provided is true and complete, to the best of my knowledge. I understand that Wisconsin law provides severe penalties for submitting false information.

Authorized Representative Name

Thomas E. Davies

Title

Director LWCD

Signature

Thomas E. Davies

Date Signed

6-1-06

E-mail address

tdavies@co.winnebago.wi.us

Telephone Number (include area code)

920-232-1950

Fax Number (include area code)

920-424-1277

Return this completed form to:

Wisconsin Department of Natural Resources  
Storm Water Program - WT/2  
PO Box 7921  
Madison, WI 53707-7921

## **BACKGROUND**

Winnebago County has over 30 Departments to serve the estimated 156,763 individuals (based on 2000 U.S. Census Bureau) within the county. Winnebago County's Land & Water Conservation Department (LWCD) is the delegated department for Winnebago County's MS4 General Permit. The LWCD has been identifying, and addressing non-point runoff, primarily rural sources, for Winnebago County citizens since the 1970's. As you read the contents of this application, please keep in mind that the LWCD communicates and meets with landowners on a daily basis. The one-on-one communications with landowners provide daily opportunities for the LWCD to be an advocate for our water resources.

In addition, Winnebago County is a member of the Northeast Wisconsin Stormwater Consortium (NEWSC). NEWSC's mission is to facilitate efficient implementation of stormwater programs locally and regionally that will meet WDNR and EPA regulatory requirements and maximize the benefit of stormwater activities in the watershed by: fostering partnerships, sharing information, seeking administrative efficiencies, and pooling financial resources. As such, activities developed by NEWSC may also be implemented into the Winnebago County MS4 permit.

Currently, Winnebago County contributes \$2,000.00 annual dues as a member of NEWSC. Winnebago County's membership is active. Two LWCD professional staff attend and contribute to the NEWSC committee meetings and development of work products, on a monthly basis. The Erosion Control Committee and the Illicit Discharge Committee are two of the NEWSC committees in which Winnebago County is continually active.

Winnebago County is also a member of the Fox-Wolf Watershed Alliance (FWWA). The FWWA is an independent, non-profit organization that identifies issues and advocates effective policies and actions to protect, restore and sustain the water resources of Wisconsin's Fox-Wolf River Basin.

Winnebago County also has active membership with the following organizations: the Lake Winnebago Land & Water Conservation Association (LWLWCA); the Wisconsin Association of Land Conservation Employees (WALCE); and Glacierland Resource Conservation and Development (RC&D). All of these organizations promote the conservation of our natural resources through various methods including, public and private partnerships, education and governmental interaction.

Please note that, irregardless of which of the 6 minimum requirements is being discussed herein, many individuals may be involved in the process. There is not one county department nor county committee that oversees all that is being requested. The WDNR's request will take considerable amount of time, effort, communications, patience, and consensus and approvals among a large body of personnel. Winnebago County LWCD will be expending considerable effort in coordinating all county departments (over 30), conducting meetings with applicable staff/personnel, gaining each applicable department committees consensus and/or committee approvals; and potential county board approval.

Please also note that, in addition to county committee(s) and/or county board approval(s), none of the activities listed in this NOI can be completed without monies being appropriated to said activities/program(s). The activities (or activity) listed within this NOI could be of no value or consequence without available monies, staff, and resources committed to the program(s).

## **Section VI : Summary of Municipal Storm Water Program Activities**

### **A. Public Education and Outreach**

**Describe the public education and outreach program activities that the municipality will implement to comply with Section 2.1 of the MS4 General Permit.**

#### **I. WDNR Requirements**

Winnebago County will submit a public education and outreach program to the DNR within 18 months of permit coverage and implement the public education and outreach plan within 24 months of permit coverage.

The public education and outreach program may include the following activities:

- 1.) promote detection and elimination of illicit discharges and water quality impacts associated with such discharges from municipal separate storm sewer systems;
- 2.) inform and educate the public about the proper management of materials that may cause stormwater pollution from sources including automobiles, pet waste, household hazardous waste, and household practices;
- 3.) promotion of beneficial stormwater practices including: onsite reuse of leaves and grass clippings, proper use of lawn and garden fertilizers and pesticides;
- 4.) promote the management of streambanks and shorelines by riparian landowners to minimize erosion and restore and enhance the ecological value of waterways;
- 5.) promote infiltration of residential stormwater runoff from rooftop downspouts, driveways and sidewalks;
- 6.) inform and, where appropriate, educate those responsible for the design, installation, and maintenance of construction site erosion control practices and stormwater management facilities on how to design, install and maintain the practices;
- 7.) identify businesses and activities that may pose stormwater contamination concerns and, where appropriate, educate specific audiences on methods of stormwater pollution prevention;
- 8.) promotion of environmentally sensitive land development designs by developers and designers.

## **II. Winnebago County Activities – Development of Public Education & Outreach Program Activities**

### **Identify Existing I&E Activities**

Winnebago County will identify all the Public Education and Outreach (which will be referred to as Information and Education and abbreviated I&E herein) programs, information and presentation activities that are currently being delivered by Winnebago County personnel. As part of identifying the existing programs being offered, Winnebago County will develop a list of all the programs, presentations, information etc. being offered (either continuously or intermittently) to any of the members of the community. Winnebago County may also identify brochures, programs or I&E activities developed/conducted by other agencies (specifically, WDNR and UW Extension) and/or organizations (NEWSC, FWWA) that are available to Winnebago County as I&E resources.

### **MS4**

#### **Identify County MS4**

Winnebago County will identify the county-owned MS4 within the EPA-defined Urban Area (UA). Winnebago County anticipates that the vast majority of the county MS4 located within the UA, drains into neighboring communities MS4, whom are required to obtain WDNR WPDES MS4 General Permit coverage. Identification of the county MS4 will aid in identifying the target audience(s).

#### **Identify Target Audiences for MS4**

Winnebago County will identify the audiences in which current I&E programs target and will then assess which audiences need to be addressed with respect to the MS4 General Permit. In general, the audiences may consists of: the community (“general public”); the target MS4 community (those individuals whom could potentially impact stormwater quality to and within the Winnebago County MS4); and appropriate municipal staff (and/or personnel maintaining county MS4). Please note that individuals residing adjacent to the county MS4 are either residents of a town or a city.

#### **Evaluation of Existing I&E vs. Needs for MS4**

Winnebago County will then determine if the existing I&E activities are sufficient to meet MS4 General Permit requirements and MS4 target audience(s). If Winnebago County deems that the existing programs/I&E activities are sufficient, then the I&E activities will be documented for future reference and use. If Winnebago County deems that the existing programs/I&E activities are not sufficient to meet existing requirements of the target audience with respect to MS4s, then based on the I&E inventory and evaluation of target audiences the

following may occur: the existing I&E programs may be revised; new I&E programs may be developed and or sought; or a combination of the above may be implemented to inform and educate the identified target audiences.

Winnebago County will also determine the frequency of program delivery with respect to audiences/activities (for example, the number of events held per year to each target audience).

## County Properties

### Identify County Properties

Winnebago County will also identify all county properties within the EPA-defined Urban Area (UA). Winnebago County anticipates that county properties located within the UA, will be served by each respective city's MS4.

### Assess Activities Occurring on County Properties

Winnebago County will then determine what type of activities/management are occurring on those properties that have the potential to impact stormwater quality.

### Identify Target Audiences for County Properties

Winnebago County will identify the audiences in which current I&E programs target and will then assess which audiences need to be addressed with respect to the MS4 General Permit. In general, the audiences may consist of municipal staff and/or their agent's personnel maintaining county properties.

### Identify/Evaluation of Existing I&E vs. Needs for County Properties

Winnebago County will then determine if the existing I&E activities are sufficient to meet MS4 General Permit requirements with respect to municipal staff. If Winnebago County deems that the existing programs/I&E activities are sufficient, then the I&E activities will be documented for future reference and use. If Winnebago County deems that the existing programs/I&E activities are not sufficient to meet existing requirements of the target audience with respect to county properties, then based on the I&E inventory and evaluation of target audiences the following may occur: existing programs may be revised; new I&E programs may be developed and or sought; or a combination of the above may be implemented to inform and educate the identified and appropriate target audience(s).

Winnebago County will also determine the frequency of program delivery with respect to specific department staff/activities/management (for example, the number of events held per year to each target audience).

**Additional I & E Input**

I&E activities may work closely with the Public Participation and Involvement and the Pollution Prevention components of the MS4 General Permit.

Winnebago County will identify the appropriate municipal staff/personnel or their agents to conduct each respective I&E activity for the MS4 and the county-owned properties.

Winnebago County may also utilize UW-Extension to promote, develop, implement, or deliver I&E activities to the community and municipal staff. Because of their educational backgrounds, UW Extension personnel is well suited for these tasks. *“Through the University of Wisconsin-Extension, all Wisconsin people can access university resources and engage in lifelong learning, wherever they live and work.”* - UW Extension Website

In addition, as indicated earlier, Winnebago County is a member of NEWSC. Winnebago County may use the NEWSC I&E plan as a model for suggestions on strategies to meet local educational goals, for guidance on how to develop the local I&E plan, and for insight on how to work with NEWSC to achieve local goals. Also, NEWSC will be sought to promote, develop, and deliver I&E activities where appropriate.



## **B. Public Involvement and Participation**

**Describe the public involvement and participation program activities that the municipality will promote to comply with Section 2.2 of the MS4 General Permit.**

### **I. WDNR Requirements**

As required by the WDNR, Winnebago County will submit a public involvement and participation program to the WDNR within 18 months of permit coverage. The program will notify the public of activities required by this permit and encourage input and participation from the public regarding these activities.

## **II. Winnebago County Activities - Development of Public Involvement and Participation Program**

### Clarification of Public Involvement and Participation Program

Winnebago County will inquire and/or research what is meant by the WDNR for the Public Involvement and Participation Program. Based on NR216 and the MS4 General Permit, examples of public involvement and participation are limited. Also, based on NR 216 and the MS4 General Permit received from the WDNR, the wording is not similar to what is stated on the Notice of Intent (NOI) received by the WDNR. NR216 and the MS4 General Permit indicate the program is notification and encouragement of the public to participate. The NOI indicates that the program consist of activities that the municipality will promote. In addition to inquiring of the WDNR, Winnebago County may perform an internet website search to assist in identifying public involvement and participation activities and/or program. The website search may include the EPA stormwater information pages and/or the Center for Watershed Protection website.

If the program consist of activities for the public to perform, then Winnebago County will evaluate what the difference is between public involvement and participation activities (Section B. of NOI) and I&E activities (in Section A. of NOI). Based on the website search and the potential information search, other counties whom are required to have a MS4 General Permit may be contacted for information regarding the activities and/or notification and encouragement of the public. A list of public involvement and participation activities and/or procedures suitable for Winnebago County with respect to the county MS4 and county-owned properties may be developed by Winnebago County.

In addition, Winnebago County Corporation Counsel (legal counsel) may be sought for an opinion regarding the potential for the county to incur liability related to the public involvement activities and/or procedures. Findings of the legal counsel on public participation involvement may be shared and acted on by the appropriate county committee(s), county board and/or public meetings, hearings etc. Legal counsel's opinion may also be sought for a better understanding of property rights issues (right to enter etc.).

#### Identify and Evaluation of Existing Public Involvement and Participation Program

Based on the determination of what a WDNR-approved Public Involvement and Participation Program may be [defined as], Winnebago County will evaluate if existing activities and/or public notice protocols and involvement is sufficient to meet WDNR requirements. To do this, an inventory of activities and/or protocol/procedures will be collected. In addition, Winnebago County may identify the target audience(s) for the activities within the public participation and involvement program.

If Winnebago County deems that the existing programs/activities and/or notification/encouragement are sufficient, then the programs/activities and/or notification/encouragement will be documented for future reference and use. If Winnebago County deems that the existing programs/activities and/or notification/encouragement are not sufficient to meet the requirements, then based on the existing programs/activities and/or notification/encouragement inventory and evaluation, the following may occur: the existing programs/activities and/or notification/encouragement may be revised; new programs/activities and/or notification/encouragement programs may be developed and or sought; or a combination of the above may be implemented.

Winnebago County will also determine the frequency of program delivery with respect to specific department staff/activities/public participation (for example, the number of events held per year to each target audience).

Once the Public Involvement and Participation Program is drafted, the Public Involvement and Participation Program may be presented to the public for comment, approval etc. in accordance with all applicable state and local regulations.

Winnebago County will identify the appropriate municipal staff/personnel and/or their agents to conduct each respective public involvement and participation activity for the MS4 and the county-owned properties (if necessary).

Winnebago County is a member of NEWSC. NEWSC programs and/or activities may assist Winnebago County with development and implementation of the Public Involvement and Participation Program. In addition, UW Extension staff, programs, and/or activities may also be utilized by Winnebago County for the Public Involvement and Participation Program.

### Winnebago County Illicit Discharge Response Procedures

Winnebago County will submit illicit discharge response procedures to the WDNR within 24 months of permit coverage. The Illicit Discharge Response Procedures will:

- illustrate the flow of communication between Winnebago County, the WDNR, and any other appropriate agency/ies,
- include the names and contact numbers of those who may be responding to reports of an illicit discharge or spill situation,
- require immediate notification to the WDNR in the event of a spill or release of a hazardous substance.

Winnebago County will identify and evaluate the number and extent of activities currently being conducted to address illicit discharges to the MS4. Based on the evaluation of the existing activities, Winnebago County will then determine if the existing illicit detection activities are sufficient to meet MS4 General Permit requirements. If Winnebago County deems that the existing illicit detection activities are sufficient, then the illicit detection activities will be documented for future reference and use. If Winnebago County deems that the existing illicit detection activities are not sufficient to meet the WDNR requirements, then one of the following may occur: the existing illicit detection activities may be revised; new illicit detection programs may be developed; or a combination of the above may be implemented for the identification, inspection, and implementation of illicit discharge response procedures.

Winnebago County will identify the appropriate municipal staff/personnel and/or their agents to conduct each respective illicit discharge response procedure for the MS4 and the county-owned properties (if necessary).

Please recognize that some of the response procedures may overlap with activities that may be contained within the illicit discharge ordinance. In addition, NEWSC resources may be utilized for the illicit discharge program.

In general, county ordinances apply to the entire county while excluding incorporated areas containing consistent ordinance requirements. Winnebago County will need to determine where and how to apply the Ordinance, specifically how to apply the ordinance to the county MS4, within the UA, but outside of the incorporated areas, and not overlap with Towns and/or other municipalities.

The illicit discharge ordinance will be developed in accordance with state and local regulations and proper public hearing notice procedures (and Winnebago County's Public Involvement and Participation Program). In addition, the illicit discharge ordinance will be reviewed and approved by the County Board. Once adopted, the ordinance will provide the necessary regulatory authority to detect and remove illicit connections and discharges to the MS4.

#### Implementation of Illicit Discharge Ordinance

Winnebago County will evaluate which department, personnel, and/or its agent will be responsible for administering the Ordinance (or portions of the Ordinance). Winnebago County anticipates routine meetings among department staff to ensure that the Ordinance is being delivered and administered consistently among all responsible parties. Winnebago County and/or its agents will perform site inspections, administration, and enforcement of the ordinance consistent with the ordinance requirements and/or procedures outlined by Winnebago County.

Winnebago County anticipates that the Ordinance will be revised periodically. Revisions may be necessary to address changes in technical issues, landowner communications, and maintaining applicable state minimum standards etc.

#### Field Screening

##### *Initial*

Winnebago County will create and implement a schedule for field screening of all major outfalls within the UA during dry weather periods. The field screenings will include visual observations and field analysis. Initial field screenings will be implemented within 36 months of permit coverage. Results of the initial field screening will be recorded on forms to be developed.

##### *On-going*

Winnebago County will develop and submit a program for on-going dry weather field screening of outfalls within the UA to the WDNR within 36 months of permit coverage. Winnebago County will evaluate the number and frequency of outfalls to be screened. Results of the on-going field screening will be recorded on forms to be developed.

#### Implementation of Ordinance

Winnebago County will evaluate and determine which department, personnel, and/or its agent will be responsible for administering the Ordinance (or portions of the Ordinance). Winnebago County anticipates periodic meetings among department staff to ensure that the Ordinance is being delivered and administered consistently among all responsible parties. Winnebago County and/or its agents will perform administration (including review of site plans), site inspections, and enforcement of the ordinance consistent with the ordinance requirements and/or procedures outlined by Winnebago County.

Winnebago County anticipates that the Ordinance will be revised periodically. Revisions may be necessary to address changes in technical standards, contractor practices, landowner communications, and maintaining state minimum requirements/standards etc.

## **E. Post-Construction Site Storm Water Management**

**Describe the pollution prevention program activities that the municipality will implement to comply with Section 2.6 of the MS4 General Permit.**

### **I. WDNR Requirements**

Winnebago County will submit a Post-Construction Storm Water Management Ordinance to the DNR within 18 months of permit coverage. Winnebago County will create and submit long-term maintenance procedures to the DNR within 18 months of permit coverage.

### **II. Winnebago County Activities – Post-Construction Site Storm Water Management Program**

#### Evaluation of Existing SMECO Ordinance

Winnebago County currently has a Stormwater Management & Erosion Control Ordinance (SMECO), which was enacted in September 2003. The current SMECO will be evaluated for consistency with NR216 and MS4 General Permit requirements.

#### Development of Ordinance (If Necessary)

Based on the evaluation, one of the following will occur: the existing SMECO will be consistent with NR216 requirements and submitted to the WDNR; or the existing SMECO will be revised to be consistent with NR216 requirements.

In the case of the existing SMECO not being consistent with WDNR requirements, then the NEWSC Model Post-Construction Storm Water Management Zoning Ordinance, other counties and/or model ordinances may be used as a base model or reference. The revisions to the Ordinance will be completed in accordance with applicable public hearing notices (and Winnebago County's Public Involvement and Participation Program) and will be approved by the County Board. Once adopted, the ordinance provides the necessary regulatory authority to require stormwater management practices at new construction sites and redevelopment sites and ensure compliance.

#### Implementation of Ordinance

Winnebago County will evaluate which department, personnel, and/or its agent will be responsible for administering the Ordinance (or portions of the Ordinance). Winnebago County anticipates periodic meetings among department staff to ensure that the Ordinance is being delivered and administered consistently among all responsible parties. Winnebago County and/or its agents will perform site inspections, administration, and enforcement of the ordinance consistent with the ordinance requirements and/or procedures outlined by Winnebago County.

Winnebago County anticipates that the Ordinance will be revised periodically. Revisions may be necessary to address changes in technical standards, site conditions, contractor practices, landowner communications, and to maintain state minimum standards etc.

## **F. Pollution Prevention**

**Describe the pollution prevention program activities that the municipality will implement to comply with Section 2.6 of the MS4 General Permit.**

### **I. WDNR Requirements**

Winnebago County will submit a Pollution Prevention Program to the DNR within 24 months of permit coverage. This plan may include:

- 1.) routine inspection and maintenance of municipally owned and operated structural stormwater management facilities to maintain efficiency;
- 2.) routine street sweeping and cleaning of catch basins with sumps;
- 3.) proper disposal of street sweeping and catch basin cleaning waste;
- 4.) addressing the use of road salt/deicers;
- 5.) proper management of leaves and grass clippings;
- 6.) provisions for the application of lawn and garden fertilizers on municipally owned properties within the UA, this includes site-specific nutrient application schedules based on appropriate soil tests;
- 7.) education of appropriate municipal and other personnel involved in implementing this program (see also public education & outreach section);
- 8.) stormwater pollution prevention planning for municipal garages, storage areas and other sources of storm water pollution from municipal garages;
- 9.) and the adoption of measures to reduce municipal sources of stormwater contamination within source water protection areas.

### **II. Winnebago County Activities – Development of Pollution Prevention Program**

#### **MS4**

##### Identify County MS4

Winnebago County will identify the county-owned MS4 within the EPA-defined Urban Area (UA). A map of the county MS4 may be prepared as part of this component.

Winnebago County will also identify any municipally owned or operated structural stormwater management facilities. To date, Winnebago County may not own or operate any structural stormwater management facilities within the UA.



#### Identify County Department/Municipal Staff for MS4

Winnebago County will identify the department(s), municipal staff (and/or their agents) currently owning, managing, operating, maintaining or responsible for the county MS4.

#### Identify Existing Pollution Prevention Activities for MS4

Once the county-owned MS4 is identified within the UA, activities and/or management of the properties occurring on the properties will be identified.

#### Evaluation of Existing Pollution Prevention Activities for MS4

Winnebago County will then evaluate the existing activities and/or management of the MS4 for potential impacts to stormwater quality. If Winnebago County deems that the existing program/activities are sufficient to meet MS4 General Permit requirements, then the program/activities will be documented for future reference and use.

If Winnebago County deems that the existing program/activities are not sufficient to meet the requirements for the MS4, then the existing program/activities may be revised; new program/activities may be developed and or sought; or a combination of the above may be implemented to meet pollution prevention program requirements.

### County Properties

#### Identify County Properties

Winnebago County will also identify all county properties within the EPA-defined Urban Area (UA).

#### Identify Departments/Staff for County Properties

Winnebago County will identify the department(s), municipal staff (and/or their agents) currently owning, managing, operating, maintaining or responsible for each county property within the UA.

#### Identify Activities Occurring on County Properties

Winnebago County will then determine what type of activities/management are occurring on those properties that have the potential to impact stormwater quality.

#### Evaluation of Existing Pollution Prevention Activities for County Properties

Winnebago County will determine if the current activities and/or management occurring on these properties are deemed to present any storm- water quality impacts. If Winnebago County determines that the current practices and activities are reasonable and prudent use and/or consistent with best management practices (BMPs), then the current procedures will be documented and presented in the Pollution Prevention Plan. If the actions, management, or activities occurring on the properties are deemed by Winnebago County to potentially impact stormwater quality or could be improved, then the activities will be evaluated for better practices and recommendations within the plan.

Winnebago County will also determine the frequency/schedule of the program activities with respect to specific department staff/activities/management (for example, the number of fertilizer applications to county turf grass areas).

Winnebago County may develop (in cooperation with NEWSC or other organizations/agencies) forms suitable for documenting activities, application rates, and procedures for the applicable management of the MS4 and/or county properties.

#### **Additional Pollution Prevention Activities**

The Pollution Prevention components may work closely with the Public Education and Outreach and the Public Participation and Involvement components of the MS4 General Permit.

Winnebago County will continue to evaluate stormwater training opportunities for staff and elected officials.